

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

BRIAN DAVID HILL,	:	1:13CR435-1
Petitioner,	:	1:22CV74-1
	:	
v.	:	
	:	
UNITED STATES OF AMERICA,	:	MOTION FOR EXTENSION
Respondent.	:	OF TIME

NOW COMES the United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and respectfully requests a fourteen (14) day extension of time within which to respond to petitioner's Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence, and in support thereof, states to the Court the following:

1. The government's response is due July 1, 2022.
2. Due to the nature and number of the Petitioner's claims, the government requests additional time in order to respond. Petitioner has raised multiple claims and, while the government's response is substantially drafted, additional time is needed to complete and file its response.
3. During the pendency of this response, the undersigned has been reviewing and preparing responses in the appellate and districts courts, to include, of late, preparing the government's response in United States v. McCloud, 1:06CR295-1, due for filing July 1, 2022, as well as reviewing

responses in: United States v. Booker, 1:18CR464-1 and United States v. Caviness, 1:06CR368-1, both filed June 30, 2022, as well as United States v. Dozier, No. 22-4233, due July 5, 2022, and United States v. Summers, II, No. 22-4168, due July 6, 2022.

4. The undersigned was on scheduled leave the afternoon of June 28, 2022.

5. Finally, additional district and appellate court responses will require completion or review by the undersigned during July, 2022.

WHEREFORE, the United States respectfully requests a fourteen (14) day extension of time, until July 15, 2022, within which to prepare and file its response.

This the 30th day of June, 2022.

Respectfully submitted,

SANDRA J. HAIRSTON  
United States Attorney

/S/ ANGELA H. MILLER  
Assistant United States Attorney  
SCSB # 11662  
United States Attorney's Office  
Middle District of North Carolina  
101 S. Edgeworth St., 4<sup>th</sup> Flr.  
Greensboro, NC 27401  
Phone: 336/333-5351

## CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, and I hereby certify that the document was mailed to the following non-CM/ECF participants:

Brian David Hill  
310 Forest Street, Apt 2  
Martinsville, VA 24112

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